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Ms. Magalie Roman Salas, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

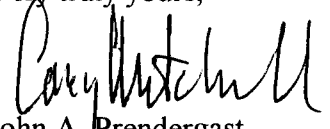
Re: CC Docket No. 94-102 / Third Quarterly TTY Implementation Report
Broadband PCS Stations KNLH424, KNLG212, KNLF775 and KNLF768
PVT Wireless Limited Partnership

Dear Ms. Salas:

On behalf of PVT Wireless Limited Partnership ("PVT"), we hereby submit their third quarterly report on implementation of TTY access to 9-1-1 emergency services, pursuant to the Commission's *Fourth Report and Order* in CC Docket No. 94-102, *released* December 14, 2000.

Please contact the undersigned counsel if you have any questions.

Very truly yours,



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Att.

PVT Wireless Limited Partnership
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October 12, 2001

Ms. Magalie Roman Salas, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Re: ***CC Docket No. 94-102 / Third Quarterly TTY Implementation Report***
Broadband PCS Stations KNLH424, KNLG212, KNLF775 and KNLF768
BTA068 F – Carlsbad, NM
BTA068 E – Carlsbad, NM
BTA386 C1 – Roswell, NM
BTA191C1 – Hobbs, NM

Dear Ms. Salas:

PVT Wireless Limited Partnership ("PVT") hereby submits its third quarterly report on implementation of TTY access to 9-1-1 over its digital wireless network, pursuant to the Commission's *Fourth Report and Order* in CC Docket No. 94-102, *released* December 14, 2000.

PVT has launched its service on the Carlsbad E-Block and Roswell C1-Block, and has configured these broadband PCS systems to operate in conjunction with the Sprint PCS nationwide network. Therefore, PVT is currently planning to abide by the TTY technical standards and solutions adopted by Sprint PCS. We understand that Sprint PCS will be providing additional information about TTY access on its network through the TTY Forum. PVT will make every effort to implement TTY capability in the Carlsbad and Roswell markets by the June 30, 2002 deadline.

With regard to the Hobbs C1-Block system, PVT has constructed its network using UTStarcom Personal Access System (PAS), which is based on Japan's RCR-28 Personal Handy Phone System (PHS) standard. According to UTStarcom, its equipment has been tested and is fully interoperable with TTY devices. In this regard, a statement from Howard Frisch, Director of North American Operations for UTStarcom, Inc., is attached.

Respectfully Submitted,

John C. Metts
Chief Executive Officer/General Manager
PVT Wireless Limited Partnership

UTStarcom

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July 26, 2001

E911 and CALEA Compliance for UTStarcom's Personal Access System

Several potential wireless system operators have requested information from UTStarcom with respect to our Personal Access System's support for E911 and CALEA requirements. FCC requirements for wireless systems require that, for E911 purposes, the PCS system must be capable of reporting the caller's location within 100m for 67% of calls and within 300m for 95% of calls. The rules also require that the system be capable of transmitting TTY signals over the air for users requiring TTY access.

With respect to location information:

UTStarcom's Personal Access System is uses the PHS Air Interface (Japan Standard RCR28) to transmit wireless signals. This standard uses microcell technology that uses very low power transmitters. As such, the normal range from a cell to a mobile phone is approximately 1000 feet, or approximately 300 meters. Given that the requirement for network based solutions is that locations be specified within 300 meters, coupled with the fact that the range from a base will be approximately 1000 feet (330 meters) or less, then reporting which cell is in contact with the subscriber will meet the 95% requirement.

For fixed wireless deployments, the UTStarcom Fixed Access Unit can be installed up to 3 miles from the radio port (cell). In this case, however, a permanently installed, directional antenna is necessary on the subscriber side of the link. Because this unit must be permanently installed, its location must be known, much as the location of a wired telephone termination is known. The PSAP ALI database should be set to show the originating location of the call as the fixed location where the subscriber unit is installed. This also complies with location requirements.

In both of these cases, the ANI going into the PSAP ALI database will look like an ANI coming from a wired telephone subscriber over the wired PSTN. It will not look like a traditional wireless call. In the case of the Fixed Access Unit (Wireless Local Loop), this is totally appropriate and the address of the fixed location should be associated with the phone number. In the case of the mobile phone, the wired switch ALI database should be set to indicate that the user is a mobile user and that the connected cell information must be retrieved separately. The capability to retrieve the information is available as a standard part of the UTStarcom's Personal Access System and this can be provided well within the required six months.

With respect to TTY transmission, with a requirement to be fully deployed by June 2002, UTStarcom's Personal Access System has been tested with the Ameriphone Model Q.90 and the Ultratec Ezcom PRO TTY models. These units were tested into the UTS702P mobile handset, the UTS708J handset, and the UTS800 Fixed Access Unit. In all cases, the TTY performed as if connected to a wired telephone line, though handover performance with the UTS702P resulted in loss of connectivity during the handover interval or about one second. This performance is consistent with the handover operation for voice calls and is not at all unique to TTY operation. All features, including the VCO and HCO operation of the Ameriphone Q.90 operated as expected from a wire line phone. The technical reason that the Personal Access System supports TTY as is while other Digital Wireless systems do not is that the PHS standard is based on 32K Voice coding versus 13K, 11K, or 8K for other digital air interfaces.

With respect to CALEA requirements, the Personal Access System is a Mobile Local Loop solution versus a traditional "go anywhere in the country" cellular solution. As a result, all calls inbound or outbound from a single user must pass through the same wired telephone switch. The Personal Access System looks to the wired telephone network as a Digital Loop Carrier (DLC) access network and not as a traditional wireless system. CALEA requirements are therefore fulfilled on the wire line/land side of the equipment. One of the CALEA requirements, to provide connected cell information within 3 seconds, can be done based on a definition of an RPC as a "cell". As this cell is typically smaller than a PCS/Cellular microcell, it should be acceptable. If microcell location information is required, this can be provided consistent with the intent of the CALEA requirements, though not necessarily in the specified 3 seconds. This should be discussed with local law enforcement staff as necessary.

Please contact us if there are any specific questions with respect to E911, CALEA, or any other capabilities of UTStarcom's Personal Access System.